

**FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

EARL PARRIS, JR., individually, and  
on behalf of a Class of persons  
similarly situated,

*Plaintiff*, and

CITY OF SUMMERVILLE, GA.,

*Intervenor Plaintiff*,

v.

3M COMPANY, DAIKIN  
AMERICA, INC., HUNTSMAN  
INTERNATIONAL, LLC, PULCRA  
CHEMICALS, LLC, MOUNT  
VERNON MILLS, INC., TOWN OF  
TRION, GEORGIA, RYAN  
DEJUAN JARRETT, and E.I. DU  
PONT DE NEMOURS AND  
COMPANY; and THE CHEMOURS  
COMPANY,

*Defendants.*

CIVIL ACTION FILE NO.:  
4:21-cv-00040-TWT

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to the Court’s Local Rules, LR App. H, Section II(J), Plaintiff and Intervenor-Plaintiff (“Plaintiffs”), by the through the undersigned counsel, respectfully requests leave of this Court to file under seal Exhibits A and B to Plaintiffs’ Objection to Assertion of Privilege and Motion for *In Camera* Review of Documents (“Motion”). Defendant Mount Vernon Mills has claimed that these

materials contain attorney/client and/or attorney work product confidential information. This information was obtained through discovery, and due to the claims by the Defendant, should be kept confidential at this time. Plaintiffs' publicly filed Motion explains our position in greater detail.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' leave to file under seal Plaintiffs' Exhibits A and B to Plaintiffs' Objection to Assertion of Privilege and Motion for In Camera Review Documents.

Respectfully submitted, this 20<sup>th</sup> day of January, 2023.

/s/ Gary A. Davis  
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/s/ Jeffrey E. Friedman

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the within and foregoing **PLAINTIFF AND INTERVENOR-PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 20<sup>th</sup> day of January, 2023.

/s/ Gary A. Davis